

Stephen R. Sady
Chief Deputy Federal Public Defender
steve_sady@fd.org
Steven T. Wax
Federal Public Defender
steve_wax@fd.org
Lisa Hay
Assistant Federal Public Defender
lisa_hay@fd.org
101 S.W. Main Street, Suite 1700
Portland, Oregon 97204
503-326-2123 Telephone
503-326-5524 Facsimile

Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA,

Case No. 3:10-cr-00475-KI

Plaintiff,

v.

MOHAMED OSMAN MOHAMUD,

Defendant.

**MOTION FOR VACATION OF
CONVICTION AND ALTERNATIVE
REMEDIES OF DISMISSAL OF THE
INDICTMENT, SUPPRESSION OF
EVIDENCE, AND NEW TRIAL FOR
THE GOVERNMENT'S VIOLATION
OF THE PRETRIAL NOTICE
STATUTE**

The defendant, Mohamed Osman Mohamud, through his attorneys, respectfully moves this Court for vacation of conviction and alternative remedies of dismissal of the indictment, suppression of evidence, and new trial for the government's violation of the pretrial notice statute. This motion

is based on the record in this case and the supporting memorandum filed contemporaneously with this motion.

Dated this 4th day of April, 2014.

/s/ Stephen R. Sady

Stephen R. Sady
Chief Deputy Federal Public Defender

/s/ Steven T. Wax

Steven T. Wax
Federal Public Defender

/s/ Lisa Hay

Lisa Hay
Assistant Federal Public Defender

Mark Ahlemeyer
Research & Writing Attorney